

That's what I'm talking about.



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March 30, 2017

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: **EX PARTE PRESENTATION**
Transition from TTY to Real-Time Text Technology
CG Docket No. 16-145

Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology
GN Docket No. 15-178

Dear Ms. Dortch:

On March 28, 2017, Dixie Ziegler of Hamilton Relay, Inc. ("Hamilton"), Jeff Knighton of Hamilton (by telephone), and David O'Connor of Wilkinson Barker Knauer, LLP on behalf of Hamilton, met with Karen Peltz Strauss, Suzanne Singleton, and Michael Scott of the Consumer and Governmental Affairs Bureau concerning the *Further Notice of Proposed Rulemaking* in the above-captioned proceedings.¹

During the meeting, the participants discussed Hamilton's comments regarding Telecommunications Relay Services ("TRS") and the need for traditional TRS providers to be included in the Real-Time Text ("RTT") ecosystem, both during the voluntary transition by wireless carriers from TTY to RTT, and after the conclusion of any such transition. Consistent with its comments in this proceeding, Hamilton requested that the Commission clarify that any wireless carrier that chooses to integrate RTT must interoperate with any traditional TRS provider's RFC 4103-conforming service.² In addition, Hamilton requested that the Commission

¹ *Transition from TTY to Real-Time Text Technology; Petition For Rulemaking To Update The Commission's Rules For Access To Support The Transition From TTY To Real-Time Text Technology, And Petition For Waiver Of Rules Requiring Support Of TTY Technology*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13,568 (2016).

² See Comments of Hamilton Relay, Inc., CG Docket No. 16-145, GN Docket No. 15-178, at 5 (filed Feb. 22, 2017).

clarify that the new reference to “real-time text communications” in Section 64.603 of the Commission’s rules means that CMRS providers subject to 711 access requirements are not required to provide 711 dialing code access to TTY users if they provide 711 dialing code access via RTT in RFC 4103-conforming format to traditional TRS providers that support RFC 4103-conforming RTT, rather than providing that dialing code access in Baudot.³ These clarifications will ensure that RTT users who need to use TRS will receive the full benefit of RTT when communicating through TRS for all supported types of traditional TRS calls (VCO, HCO, Speech-to-Speech, etc.).

This filing is made in accordance with Section 1.1206(b)(1) of the Commission’s rules, 47 C.F.R. § 1.1206(b)(1). In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,



/s/ Dixie Ziegler

Vice President
Hamilton Relay, Inc.

cc (via email): Participants

³ *Id.*